UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Note to Reader January 15, 1998

Background: As part of its effort to involve the public in the implementation of the Food Quality Protection Act of 1996 (FQPA), which is designed to ensure that the United States continues to have the safest and most abundant food supply. EPA is undertaking an effort to open public dockets on the organophosphate pesticides. These dockets will make available to all interested parties documents that were developed as part of the U.S. Environmental Protection Agency's process for making reregistration eligibility decisions and tolerance reassessments consistent with FQPA. The dockets include preliminary health assessments and, where available, ecological risk assessments conducted by EPA, rebuttals or corrections to the risk assessments submitted by chemical registrants, and the Agency's response to the registrants' submissions.

The analyses contained in this docket are preliminary in nature and represent the information available to EPA at the time they were prepared. Additional information may have been submitted to EPA which has not yet been incorporated into these analyses, and registrants or others may be developing relevant information. It's common and appropriate that new information and analyses will be used to revise and refine the evaluations contained in these dockets to make them more comprehensive and realistic. The Agency cautions against premature conclusions based on these preliminary assessments and against any use of information contained in these documents out of their full context. Throughout this process, If unacceptable risks are identified, EPA will act to reduce or eliminate the risks.

There is a 60 day comment period in which the public and all interested parties are invited to submit comments on the information in this docket. Comments should directly relate to this organophosphate and to the information and issues available in the information docket. Once the comment period closes, EPA will review all comments and revise the risk assessments, as necessary.

These preliminary risk assessments represent an early stage in the process by which EPA is evaluating the regulatory requirements applicable to existing pesticides. Through this opportunity for notice and comment, the Agency hopes to advance the openness and scientific soundness underpinning its decisions. This process is designed to assure that America continues to enjoy the safest and most abundant food supply. Through implementation of EPA's tolerance reassessment program under the Food Quality Protection Act, the food supply will become even safer. Leading health experts recommend that all people eat a wide variety of foods, including at least five servings of fruits and vegetables a day.

Note: This sheet is provided to help the reader understand how refined and developed the pesticide file is as of the date prepared, what if any changes have occurred recently, and what new information, if any, is expected to be included in the analysis before decisions are made. It is not meant to be a summary of all current information regarding the chemical. Rather, the sheet provides some context to better understand the substantive material in the docket (RED chapters, registrant rebuttals, Agency responses to rebuttals, etc.) for this pesticide.

Further, in some cases, differences may be noted between the RED chapters and the Agency's comprehensive reports on the hazard identification information and safety factors for all organophosphates. In these cases, information in the comprehensive reports is the most current and will, barring the submission of more data that the Agency finds useful, be used in the risk assessments.

Jack E. Housenger, Acting Director

Special Review and Reregistration Division



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OFFICE OF PREVENTION, PESTICIDES, AND TOXIC SUBSTANCES

PC Code: 058001 DPBarcode: D251860

Case No.: 0234 Date 1/5/99

MEMORANDUM:

SUBJECT: Azinphos-methyl: Revision of Draft EFED Reregistration Eligibility Decision

(RED) Science Chapter to Include Registrant's Comments

FROM: Jean Holmes, Biologists (Team Leader)

Dave Jones, Agronomist (Fate and Water Resource Assessment)

William Erickson, Biologist (Terrestrial Assessment) Andy Bryceland, Biologist (Aquatic Assessment) Environmental Fate and Effects Division (7507C)

THRU: Betsy Grim, Chief (Acting)

ERBII/EFED (7507C)

TO: Barry O"Keefe,

Reregistration Branch 2

Special Review and Reregistration Division (7508C)

Attached please find a revised EFED Reregistration Eligibility Decision (RED) science chapter for azinphos methyl which includes corrections to errors identified by the registrant BAYER in their letter, ""Response to the Draft EFED Reregistraion Eligibility Decision (RED) Science Chapter for Azinphos-methyl, List A Case 0235".

The following changes identified by the registrant have been incorporated into the EFED science chapter:

- o The typographical error on page 43 has been corrected from brown trout to brook trout.
- o The common taxonomic usage of the test species for the studies (MRID # 41202002 and 4038052) will be corrected from <u>Americamysis bahia</u> or opossum shrimp to <u>Mysidopsis bahia</u> or mysid shrimp.
- o The reformatting error in the maximum EEC, average maximum EEC and the Risk quotients (RQ) for birds and mammals have been corrected.

- o All references to "Bayer Inc.'s" will be replaced with "Bayer Corporation's".
- **o** The inclusion of the table on pages 145 to 147 was in error; therefore, it has been deleted.
- **o** A brief description of the averaging period used to generate the average EEC's for the chronic risk to birds and mammals was added..
- **o** In the surface water assessment, an explanation of how the aerobic aquatic degradation rate was derived has been added. It is 3 times the aerobic soil metabolism input value in PRIZM.

The following issues raised by the registrant are addressed below but do not require a revision to the EFED science chapter.

- **o** An aerobic aquatic study (MRID 4411801), identified by the registrant, which is not included in the document. This study was reviewed by EFED and found to be invalid; therefore, it was not incorporated into EFED's assessment of azinphos methyl. The completed DER will be sent shortly.
- **o** A mesocosm study (MRID 41549401), identified by the registrant, which is not included in the document. This study was reviewed by EFED and found to be invalid; therefore, it was not incorporated into EFED's assessment of azinphos methyl.
- **o** In the surface water assessment, a value of 1.02x10-4 h-1 was used for the aerobic aquatic degradation rate. The correct value should be 1.51x10-4 h-1. However, since the hydrolysis rate was considered in the assessment, the corrected value of 1.51x10-4 h-1 does not make a significant effect on the results of the surface water assessment.

The following issues raised by the registrant will be addressed during the 60 day comment period:

- **o** Comments regarding the use of a monitoring study to establish the acute ground water exposure concentration.
 - o The supplemental status of the Deer Mouse (MRID No. 408583-01) study.
 - o EFED's interpretation of the terrestrial field and pen tests.
- **o** A rainbow trout study (MRID No. 158231), identified by the registrant, which is not included in the EFED chapter.
 - o A difference in NOEC for the Bobwhite reproduction study. This was not used in the

risk assessment.

- \mathbf{o} The method used to derive the average EECs in the assessment of chronic risk to birds and mammals.
 - o The foliar half-live in supplemental studies conducted in Georgia and Mississippi.
 - o The registrants interpretation of the field dissipation studies in Georgia and Mississippi.

Attachments